

SCANNED

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DONALD RENKOWIC
PLAINTIFF.

04 - 30202 - MAP

Vs.

FRANKLIN COUNTY HOUSE OF CORRECTION AND
JAIL, SHERIFF FREDERICK MACDONALD, ET., AL.
DEFENDANTS.

AFFIDAVIT IN SUPPORT OF A MOTION TO COMPEL PRODUCTION

I DONALD RENKOWIC, BEING FIRST DULY SWORN, ON HIS OATH
STATES ;

THAT HE IS THE ABOVE NAMED PLAINTIFF AND HE MAKES THIS
AFFIDAVIT IN SUPPORT OF THE MOTION FOR PRODUCTION OF DOCUMENTS
AND THINGS FOR INSPECTION, COPYING AND PHOTOGRAPHING WHICH IS
ATTACHED HERETO ; THAT THE PRODUCTION OF THE DOCUMENTS,
PAPERS, STATEMENTS, AND THINGS REQUESTED IS MADE IN GOOD FAITH;
THAT HE HAS BEEN INFORMED AND THEREFORE BELIEVES THAT THE
MATTERS AND THINGS SO SOUGHT IN THE MOTION ARE COMPETENT AS
EVIDENCE IN SAID CAUSE AND ARE ESPECIALLY COMPETENT BY REASON
OF THE FACT THAT THE DOCUMENTS ARE NECESSARY FOR SUPPORTING
HIS COMPLAINT; THAT THE FACTS SOUGHT TO BE ELICITED ARE FACTS
NECESSARY TO BE SHOWN AND PRODUCED IN SAID CAUSE IN THE
FURTHERANCE OF JUSTICE AND IN SECURING ALL THE FACTS COMPETENT
UPON THE ISSUES TO BE TRIED.

THE MOTION HEREIN MADE IS MADE IN GOOD FAITH AND THE
AFFIANT AS ONE OF COUNSEL FOR THE PLAINTIFF DESIRES TO INSPECT
THE DOCUMENTS SOLELY FOR THE PURPOSE OF ESTABLISHING FACTS TO
BE USED AS EVIDENCE IN THE ABOVE CAUSE AND THE AFFIANT DOES NOT
INTEND TO USE SAID INFORMATION FOR ANY OTHER PURPOSE OR TO
CONVEY THE SAME TO ANY OTHER PARTY OR PERSONS

DATED THIS 28th DAY OF September 2004,

A handwritten signature in black ink, appearing to read "D. Renkowic", written over a horizontal line.

DONALD RENKOWIC, PRO SE.
160 ELM STREET
GREENFIELD , MASS. 01301